



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

January 21, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Carpenter Company / 039-17845-00086

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

January 21, 2004

Mr. Jay Miller
Carpenter Company
P. O. Box 2386
Elkhart, Indiana 46515

Re: T039-17845-00086
Fourth Administrative Amendment to
Part 70 039-6059-00086

Dear Mr. Miller:

Carpenter Company, located at 195 County Road 15 South, Elkhart, Indiana 46515 was issued a Part 70 permit on June 11, 1999 for a stationary source that manufactures soft block foam, chemical blending for customers, and cushion blocks. A third administrative amendment T039-17761-00086 to the Part 70 permit was issued on June 16, 2003. A letter requesting an administrative review of permit T039-17761 was received on July 8, 2003. The administrative review request was filed in the Office of Environmental Adjudication under Cause Number 03-A-J-3117. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Carpenter Company has requested that the, One (1) new adhesive station which will utilize acetone-based adhesive, exhausting through a new vent (22a), be removed from the Part 70 permit as modified by the Part 70 permit Administrative Amendment T039-17761. IDEM is granting the sources request. The changes will be as follows: (All deleted changes will be indicated with strike-out and new language will be indicated with bold type)

1. Section A.2, of the issued Part 70 permit T039-6059-00086 will be amended to remove the adhesive station in item (c):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) and (b) no change

- (c) Three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.A.2

~~One (1) new adhesive station which will utilize acetone-based adhesive, exhausting through a new vent (22a).~~

2. Section D.3 will be amended to remove the new adhesive station:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) Three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

~~One (1) new adhesive station which will utilize acetone-based adhesive, exhausting through a new vent (22a).~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

These changes to the Part 70 operating permit T039-6059-00086 are intended to settle the appeal filed as Cause Number 03-A-J-3117.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact James Farrell, at (800) 451-6027, extension 3-8396, or dial (317) 233-8396.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

JF

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section – Lynetta Brown-Glover
Administrative and Development - Delisa Lee
Technical Support and Modeling - Michele Boner
Office of Legal Counsel - April Schultheis

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Carpenter Company
195 County Road 15 South
Elkhart, Indiana 46515**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6059-00086	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 11, 1999 Expiration Date: June 11, 2004

First Significant Permit Modification No.: 039-14225, issued on August 14, 2001

Re-opening No.: 039-13216, issued on November 26, 2001

First Administrative Amendment No.: 039-15274, issued on March 5, 2002

Second Administrative Amendment No.: 039-17257, issued on April 23, 2003

Third Administrative Amendment No.: 039-17761, issued on June 16, 2003

Fourth Administrative Amendment No.: 039-17845	Pages Affected: 5, 34
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 21, 2004

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source that produces soft block foam, chemical blending for customers, and cushion blocks.

Responsible Official: Tommy Stinson
Source Address: 195 County Road 15 South, Elkhart, IN 46515
Mailing Address: P.O. Box 2386, Elkhart, IN 46515
SIC Code: 3086, 2899
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.
- (b) One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.
- (c) Three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.
- (d) One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.
- (e) One (1) bonded foam line, identified as EU-04, consisting of the following equipment:
 - 1. grinding operation,
 - 2. pneumatic conveyor system,
 - 3. storage bins,
 - 4. foam dry mixer,
 - 5. wet mixer,
 - 6. molding unit, and
 - 7. storage operations.
- (f) Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) Three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for each adhesive station shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.